

# EXHIBIT L

**From:** [Maxwell Pritt](#)  
**To:** [Kathleen Hartnett](#); [Reed Forbush](#); [Ghajar, Bobby A.](#); [Morton, Phillip](#)  
**Cc:** [Stameshkin, Liz](#); [David Simons](#); [Lauter, Judd](#); [Angela L. Dunning](#); [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); [Ghazarian, Colette A.](#); [Jesse Panuccio](#); [Poppell, Cole A.](#); [Biksa, Liene](#); [Weinstein, Mark](#); [Alvarez, Jessica](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSF](#); [Josh Schiller](#); [David Boies](#); [z/Meta-Kadrey](#)  
**Subject:** RE: Kadrey v. Meta - Joint Motion re Discovery Briefing  
**Date:** Monday, October 28, 2024 7:25:57 PM

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Kathleen, we do not appreciate your email below and ask that you withdraw it. Plaintiffs have diligently sought to raise and meet and confer with Meta on the outstanding discovery issues, only to be met repeatedly with delay and silence on multiple issues and multiple requests. We also requested a conference to address all outstanding issues, including page limits and a briefing schedule for such issues, before the interim deadline for submitting letter briefs. We do not agree the parties need a different interim deadline from Judge Chhabria but if you disagree then we expect you to agree to a stipulation setting forth a reasonable one in light of the parties' meet and confer and that works for Judge Hixson. Please confirm you will agree to such a stipulation if you believe it's necessary. We reserve all rights, including to seek sanctions, and absent your agreement will so move.

Best,  
Max

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**From:** Hartnett, Kathleen <khartnett@cooley.com>  
**Sent:** Monday, October 28, 2024 7:16 PM  
**To:** Reed Forbush <rforbush@BSFLLP.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Morton, Phillip <pmorton@cooley.com>  
**Cc:** Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; mlemley@lex-lumina.com; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama\_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

**Subject:** RE: Kadrey v. Meta - Joint Motion re Discovery Briefing

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Counsel:

We write regarding your proposed stipulation as well as your continued outreach to the Court seeking a conference on disputes regarding existing written discovery. As you know, the parties agreed to an October 23, 2024 deadline for “Letter Briefs re: Existing Written Discovery” and an October 16, 2024 deadline to “Meet and Confer re: Existing Written Discovery,” which are now court-ordered deadlines. Doc. No. 238 at 2. Counsel for Meta participated in a three-hour meet and confer call with you on October 16 regarding Plaintiffs’ purported concerns about Meta’s responses to existing written discovery, as required by those deadlines. The issues you have been attempting to raise in a conference with the Court, and that you now have proposed as part of your stipulation, all were subject to the October 23 letter briefing deadline. Plaintiffs did not serve on Meta or file any letter brief on these issues by October 23; nor did it timely seek leave to move that deadline. The first we saw any draft proposed submission from Plaintiffs was today—five days past the Court-ordered deadline to file a joint letter brief. Accordingly, we request that you withdraw your untimely request for a conference with the Court regarding any existing written discovery disputes. We also cannot agree to your proposed stipulation because the issues were not timely briefed to the Court (and Judge Hixson cannot modify the case schedule ordered by Judge Chhabria, in any event). If Plaintiffs will not withdraw their request for a conference, we will reach out to Judge Hixson’s clerk explaining that your request for a conference regarding existing written discovery disputes is untimely and that all such disputes have been waived.

We also disagree that a special master is necessary or appropriate at this time. The time to propose such a dramatic change to the conduct of discovery in this case was at or before the hearing before Judge Chhabria on October 4. We are now only approximately 6 weeks out from the new, extended close of discovery. For any special master to get up to speed would only introduce further delay. The parties and Court would be better served by wrapping up the depositions and new written discovery and putting any new disputes to Judge Hixson, who has been promptly hearing and addressing timely raised discovery disputes as they arise.

Thanks,  
Kathleen

**Kathleen R. Hartnett**

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Pronouns: she, her, hers

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**From:** Reed Forbush <[rforbush@BSFLLP.com](mailto:rforbush@BSFLLP.com)>

**Sent:** Monday, October 28, 2024 4:39 PM

**To:** Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Morton, Phillip <[pmorton@cooley.com](mailto:pmorton@cooley.com)>

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**Subject:** Kadrey v. Meta - Joint Motion re Discovery Briefing

**[External]**

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Dear Counsel,

1. Please find attached a proposed draft joint administrative motion Plaintiffs seek to file with your additions and consent to set up an expedited joint briefing schedule with a 30-page limit for the parties to present to the Court discovery disputes for which there is currently an impasse.
2. In addition to seeking the joint letter briefing, Plaintiffs also propose that the Court enlist a Discovery Referee/Special Master to address the parties' discovery disputes in light of the numerous disputes at issue and the need for expediency. Plaintiffs have checked with JAMS and confirmed the availability of Daniel Garrie to serve in that role. Please let us know if you consent to our making that proposal to the Court jointly and we will draft the papers (joint motion/stipulation).

Best regards,  
Reed

**Reed D. Forbush**

Counsel

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